



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: 9700024

Category: NSPS
EPA Office: Region 4
Date: 10/03/1994
Title: Alternate Test Method-Quarry Conveyor
Recipient: Schwenn, Mary
Author: Harper, Jewell

Subparts: Part 60, OOO, Nonmetallic Mineral Processing

References: 60.672

Abstract:

Q. Will EPA approve an alternative initial performance test method for a quarry conveyor?

A. EPA will not accept data from one conveyor in lieu of data for the conveyor in question, since the similarity of the two operations does not guarantee the emissions will be identical. However the use of Method 22 rather than Method 9 will be appropriate for initial performance test at the new conveyor as long as specified conditions are met.

Letter:

4ATP-AEB OCT 03 1994

Ms. Mary B. Schwenn
Manager
Field Services/Technical Evaluations Division Forsyth County Environmental Affairs
Department 537 North Spruce Street Winston-Salem, NC 27101

SUBJ: New Source Performance Standards (NSPS), Subpart OOO Request by Vulcan Materials Company (VMC), North Carolina to Approve an Alternate Test Method for C-20 Conveyor

Dear Ms. Schwenn:

This is to acknowledge receipt of your September 8, 1994, request (with attachments), that the Environmental Protection Agency (EPA) approve the use of an alternate test method at the referenced facility. After reviewing the enclosed information, we have determined that the North Quarry test data cannot be approved as an alternate test for the C-20 conveyor. However, we can approve the use of Method 22 test for the initial performance test for the C-20 Conveyor.

In a letter dated January 14, 1994, you had requested a waiver from the visible emissions testing requirement for the C-20 Conveyor since the conveyor handles wet material. In our March 10, 1994, letter to you, we denied the request for a waiver since there was not enough data to support an assumption that the moisture content in the material (estimated to be 6 percent) was sufficient to control visible emissions. Instead, we recommended that the company perform an initial visible emissions test in accordance with 60.672(a) in order for EPA to consider waiving future testing. It was suggested that the initial testing be conducted during four individual truck loadings, as long as each truck loading lasted at least fifteen minutes, and the material moisture content was determined simultaneously for each load.

In the interim, VMC constructed another NSPS conveyor (loadout belt) at its North Quarry before it constructed the C-20 Conveyor. This conveyor is almost identical to the C-20 Conveyor in both process and materials conveyed. On May 19, 1994, an initial visible emissions test was conducted at the North Quarry, during which the moisture content of the material was also determined simultaneously. A modified Method 22 was used instead of Method 9 because the conveyor took an average of only 35 seconds to load each truck, and Method 9 requires one opacity reading every 15 seconds.

Since it took such a short time to load each truck when the test was conducted, the company has requested that we approve the use of Method 22 in lieu of Method 9 for the test conducted on May 19, 1994. We have reviewed the referenced visible emissions test report and noted that the initial test using Method 22 was conducted over a period of about three hours, and the accumulated observation time was approximately 30 minutes. Since the testing shows an emission frequency of zero percent for the loadout belt, we can approve the use of Method 22 test for this facility, as long as the moisture content in the material never falls below 6.2 percent by weight.

The company also requested that data from the North Quarry test be accepted as a compliance demonstration for the C-20 Conveyor in the East Quarry if the use of Method 22 is approved for the North Quarry test. The fact that the operation of the conveyor in the East Quarry is similar to that of the conveyor in the North Quarry does not guarantee the emissions from the conveyors will be identical. Therefore, we believe that the conveyor in the East Quarry should be tested also. We would approve the use of Method 22 for the initial performance test at the C-20 Conveyor, as long as the emission frequency is zero percent, the total test time is at least three hours, and the accumulated time is at least 30 minutes.

If you have any questions regarding this letter, please contact Mr. Mirza P. Baig of my staff at (404) 347-3555, voice mail extension 4147.

Sincerely yours,

Jewell A. Harper
Chief
Air Enforcement Branch
Air, Pesticides and Toxics
Management Division